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November 29, 2005

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PSC SC SC

MAIL I DMS

Public Service Commission of South Carolina Attn: Docketing Department P.O. Drawer 11649 Columbia, SC 29211

Re: Docket No. 2005-270-G

Dear Sirs:

Enclosed please find the original and one (1) copy of a Petition to Intervene and a Certificate of Service by Mail in the above referenced matter. Please file these documents with the records of your office and return clocked copy to me in the enclosed envelope.

By copy of this letter, I am hereby serving the Petition to Intervene and Certificate of Service by Mail on all parties listed on the Certificate of Service by Mail.

With kindest regards, I remain

Respectfully,

SPENCER & SPENCER, P.A.

Paul Dellingham

Paul W. Dillingham

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2005-270-G

| Patriots Energy | Group,) | |
|---|--------------|--|
| P | etitioner.) | |
| In Re: |) | |
| Request for Investigation to Determine Whether a Regulation Should Be Promulgated Requiring Relocation of Certain Meter Sets or Installation of Splash Guards on These Meter Sets | | |

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PETITION TO INTERVENE

Patriots Energy Group ("PEG") hereby petitions the Public Service Commission of South Carolina ("Commission") pursuant to Rule 103-836 of the Commission's Rules and Regulations, for permission to intervene and to be made a party of record in the above captioned docket. In support of this petition, PEG alleges as follows:

1. PEG is a joint action agency organized in accordance with South Carolina law to separately and/or jointly deliver and/or supply natural gas to residential, industrial and other customers located in Chester, Union, Lancaster, Kershaw, York and Cherokee Counties.

75692.1

- 2. The Commission has established this proceeding to review potential hazards arising from the use of certain meter set configurations by natural gas local distribution companies.
- 3. The Commission has assigned Docket No. 2005-270-G to the referenced matter and set a hearing for January 19, 2006.
- 4. PEG has a direct and material interest in the issues to be addressed and resolved by the Commission in this docket.
- 5. Given the state of the record at this state of the proceedings, PEG lacks sufficient information to fully develop and state its position in this proceeding at this time.
- 6. Granting PEG's request to me made a party of record in the above captioned proceeding is in the public interest, is consistent with the policies of the commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.
- 7. PEG's authorized representative for purposes of this docket, to whom communications regarding this matter may be made, are:

Paul W. Dillingham, Esquire Spencer & Spencer, P.A. 226 East Main Street, Suite 200 P. O. Box 790 Rock Hill, SC 29731 Telephone: (803) 327-7191

wherefore, PEG prays that it will be allowed to intervene in this docket and all proceeding incident thereto, including the

- 2 -

right to appear as a party; engage in discovery, make motions, participate in hearings by offering testimony and exhibits, and cross-examining witnesses, and receive service of all notices, documents, exhibits and data submitted by all parties and the Commission's staff. PEG is requesting that it be allowed to intervene in this matter after the expiration of the normal intervention deadline due to the fact that PEG only recently realized it has an interest in this matter and believes that this intervention will not prejudice any other party. Unless the Commission or some other interested party objects to this request for late intervention, PEG will assume that this request is agreeable to the parties involved, including the Commission, and that this Petition is accepted.

SPENCER & SPENCER, P.A.

By:

Faul W. Dillingham
Attorney for Petitioners
S.C. Bar No.15021

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Rock Hill, S. C.

November 29, 2005

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2005-306-G

| Patriots Energy Group |) |
|------------------------------|----------------------------------|
| |) CERTIFICATE OF SERVICE BY MAIL |
| |) |
| Petitioners. |) |
| |) |
| In Re: |) |
| |) |
| Request for Investigation to |) |
| Determine Whether a |) |
| Regulation Should Be |) |
| Promulgated Requiring |) |
| Relocation of Certain Meter |) |
| Sets or Installation of |) |
| Splash Guards on These Meter |) |
| Sets. |) |
| |) |

I certify that the foregoing Petition to Intervene has been served via facsimile to the Public Service Commission at 803-896-5246 and by U.S. Mail, first-class, postage-prepaid, and to the addressees shown below via U.S. Mail, first class, postage-prepaid, this <u>39</u> th day of <u>November</u>, 2005.

Public Service Commission of SC Attn: Docketing Department P. O. Drawer 11649 Columbia, SC 29211

James H. Jeffries, IV Moore & Van Allen, PLLC Bank of America Corporate Center 100 North Tryon Street, Suite 4700 Charlotte, NC 28202-4003 Jan M. Ayer 1140 Ridgecrest Avenue North Augusta, SC 29841

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SPENCER & SPENCER, P.A.

By:

Paul W. Dillingham Attorney for Petitioners S.C. Bar No. 15021

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